



April 18, 2006

Financial Crimes Enforcement Network  
Attn: 1506-0001, Revised Suspicious Activity Report by Depository Institutions

To: Financial Crimes Enforcement Network,

As Bank Secrecy Act and Anti-Money Laundering Officer for Associated Banc-Corp, I am submitting suggestions for the revised Suspicious Activity Report used by depository institutions.

I want to express my great appreciation to FinCEN for allowing banks the opportunity to comment on the revisions of this form. Your agency has worked hard to improve the effectiveness of the Bank Secrecy Act regulation by forming partnerships with regulatory examiners, law enforcement and financial institutions to help evaluate the overall process. Additionally, the information provided through your web site and regulatory helpline has proven to be a valuable resource for compliance professionals.

The Suspicious Activity Report is an essential tool used by law enforcement to receive information concerning potential financial crimes. I recognize that the volume of submitted forms is tremendous and the goal is for financial institutions to provide quality information to law enforcement that can assist an investigation. With that goal in mind, I am offering the following suggestions for your consideration:

**Part II - Data item 23**

- Add an additional box to address Money Service Businesses. Banks continue to focus on this particular industry and frequently identify unregistered businesses or unusual activity within these accounts.

**Part III - Data item 35**

- Add an additional box to address non-customers. Several reports filed by institutions involve individuals that have no relationship with the bank. Traditionally, we have used box "s" (other) to identify individuals as non-customers. Adding a box for these types of suspects would provide an additional level of clarification and simplify the process.

### **Add Additional Box – Date Determined Suspicious**

- Banks have a regulatory responsibility to file a Suspicious Activity Report within 30 or 60 days from date they determine the activity to be suspicious. Currently, there are no boxes available which clearly identify this date. Box # 21 (Date range of suspicious activity) and box # 58 (Date filed) do not establish a date when the bank determined the activity to be suspicious. Providing a box titled “Date Determined Suspicious” on the report would help both law enforcement and regulatory examiners to understand the bank’s investigation timeline. Additionally, this box would help isolate late filings and avoid confusion during regulatory examinations.

In conclusion, I would like to thank you for your consideration of these suggestions and appreciate your continued willingness to improve this process.

Sincerely

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